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COMMENTS ON THE DRAFT SITE INSPECTION PRIORITIZATION REPORT
TEXAS INSTRUMENTS INCORPORATED ATTLEBORO, MASSACHUSETTS SITE
 CERCLIS No.: MAD007325814 Draft Date: May 20, 1998
 Prepared by: Lisa White of Stone & Webster

Comments submitted by: Michael J. Elliott, Environmental Manager
 Texas Instruments Incorporated, Materials & Controls
 Comments submission date: June 17, 1998

PAGE	SECTION	COMMENTS
i	Cover/Title Page	The name of Texas Instruments Incorporated is erroneously written throughout the entire report as "Texas Instruments, Inc." The legally correct version is with no comma, and with the word "Incorporated" spelled out in entirety. Lisa White acknowledged that she was familiar with the correct spelling, but that she was obligated to be consistent with the name as it appears in EPA files. Can EPA correct the file? <i>Comment will be investigated</i>
1	SITE DESCRIPTION, 1 st paragraph, 3 rd sentence	Approximately one-third of the site has been developed. <i>Comment will be incorporated into Final SIP</i>
2	SITE DESCRIPTION, Figure 1, Site Location Map	TI provided Lisa with a marked-up version of the map showing more accurate stream flow directions. <i>Comment will be incorporated into Final SIP</i>
3	SITE DESCRIPTION, Figure 2, Site Vicinity Map	TI provided Lisa with a CAD drawing, both electronic and print, containing a suggested replacement map. (See attached figures.)
4	SITE DESCRIPTION, Figure 3, Site Sketch	TI provided Lisa with a CAD drawing, both electronic and print, containing a suggested replacement map. (See attached figures.)
5	SITE DESCRIPTION, Figure 4, Site Plan with Sampling Locations	TI provided Lisa with a CAD drawing, both electronic and print, containing a suggested replacement map. (See attached figures.)
6	SITE DESCRIPTION, 2 nd full paragraph on page, 2 nd sentence	All roads are privately owned on the TI site, so TI questions the validity of the statement that "several public roads traverse the site." <i>Comment will be incorporated into Final SIP.</i>
6	SITE DESCRIPTION, 2 nd full paragraph, 3 rd sentence	Delete "north-northwest corner," replace with "eastern edge." <i>Comment will be incorporated into Final SIP.</i>
6	SITE DESCRIPTION, 3 rd full paragraph on page, 1 st sentence	Delete "semi-conductors." <i>Comment will be incorporated into Final SIP.</i>
6	SITE DESCRIPTION, Building 2, 1 st sentence	Delete "9," replace with "3." <i>Comment will be incorporated into Final SIP.</i>
8	SITE DESCRIPTION, Buildings 23 and 24	May want to specify that these buildings are leased space. Bldg 23 at 33 Perry avenue is owned by Thomas & Betts. Bldg 24 at 32 Forest Street is owned by D&G Realty. <i>Comment will be incorporated into Final SIP.</i>

Figures will be incorporated into text.

8	SITE DESCRIPTION, last paragraph on page, 3 rd sentence.	Specify "low level" radioactive material. Append the following language at end of sentence: "as recommended by the Atomic Energy Commission (AEC)." <i>Comment will be incorporated into final SIP.</i>
9	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 2 nd and 3 rd paragraphs	These two paragraphs refer to a 1 st and 2 nd spill. The sequence, however, is reversed on Figures 3 and 4. <i>Text & figures will be made consistent.</i>
9	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 3 rd paragraph	At the end of the description of the spill near Bldg 11, suggest adding the following update: "In 1996, during TI's Nuclear Decommissioning Project, approximately 400 cubic yards of Trichloroethylene contaminated soils were excavated from this location. After sampling and analysis in accordance with the Waste Management plan contained in an Interim Measure Plan per the Massachusetts Contingency Plan (310 CMR 40.0000), the soil was transported to Envirocare of Utah, Inc. for disposal in accordance with their site operating license. TI believes that this may account for the material presumed to have been sent to an unknown location." <i>Comment will be incorporated into final SIP.</i>
10	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 5 th full paragraph	There is reference here to the presence of Mercury. As with other locations throughout the report, Lisa was not sure if this needed to be included - she promised to check. Her latest guidance was to limit reference to constituents only if they exceed 3 times background or if they are not naturally occurring. <i>Comment will be investigated.</i>
10	OPER. & REG. HIST. & WASTE CHARACTERISTICS, last paragraph on page	Transition from previous two paragraphs is unclear. Sounds like there's more than one set of sludge lagoons, and there isn't - just one set onsite. <i>Comment will be incorporated into final SIP.</i>
12	OPER. & REG. HIST. & WASTE CHARACTERISTICS, top paragraph on page, 1 st full sentence	Delete "M&E" replace with "TI." <i>Comment will be incorporated into final SIP.</i>
12	OPER. & REG. HIST. & WASTE CHARACTERISTICS, top paragraph on page, parenthetical note	Details of groundwater treatment system performance have always been documented in the Semi-Annual Reports submitted to the DEP. <i>Text will be modified.</i>
12	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 1 st full paragraph on page, 2 nd sentence	Details of groundwater monitor well sampling have always been documented in the Semi-Annual Reports submitted to the DEP. <i>Text will be modified.</i>
12	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 2 nd full paragraph on page, parenthetical note after 1 st sentence	Details of groundwater monitor well sampling have always been documented in the Semi-Annual Reports submitted to the DEP. <i>Text will be modified.</i>

12	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 4 th full paragraph on page, 2 nd sentence	Delete "abandoned" replace with "out-of-service." Comment will be incorporated into Final SIP.
12	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 4 th full paragraph on page, parenthetical note at end of paragraph.	Details of the sampling effort are known. They are documented in TI's letter to MADEP which is available on request. Text will be modified.
13	OPER. & REG. HIST. & WASTE CHARACTERISTICS, 3rd full paragraph on page	Specify that data comes from 1997 SARA Tier II reports. Comment will be incorporated into Final SIP.
17	OPER. & REG. HIST. & WASTE CHARACTERISTICS, Source 21 - Historic Spills, 2 nd paragraph	See related comment previously suggested at page 9 concerning spill at Bldg 11. Comment will be incorporated into Final SIP.
18	OPER. & REG. HIST. & WASTE CHARACTERISTICS, Source 22 - Low-level Rad. Disposal Pit, 2 nd sentence	TI anecdotal evidence suggests historical disposal consisted of construction debris and wrecked-out building materials. Disposal of contaminated soils other than low level radioactive materials has never been suspected as this report seems to suggest. Comment will be incorporated into Final SIP.
18	OPER. & REG. HIST. & WASTE CHARACTERISTICS, Source 23 - Acid Neutralization Lagoon, 3 rd sentence	As this feature is now under pavement, surface water and air pathways are not a valid concern. Reference to these pathways should be deleted. Comment will be incorporated into Final SIP Report.
21	GROUNDWATER PATHWAY, Groundwater Sampling, 1 st paragraph, 1 st sentence.	Replace "1984" with "1982." Comment will be incorporated into Final SIP Report.
21	GROUNDWATER PATHWAY, Groundwater Sampling, 1 st paragraph, 2 nd to last sentence.	Sampling and analysis is documented in detail in both the GEI and ESC reports. This statement is invalid. Comment will be incorporated into Final SIP Report.
22	GROUNDWATER PATHWAY, Groundwater Sampling, 2 nd paragraph below table 3, parenthetical note after 1 st sentence.	This statement is not valid for reasons previously mentioned. Comment will be incorporated into Final SIP Report.
26	SURFACE WATER PATHWAY, Surface Water Sampling, 1 st paragraph, 2 nd sentence.	There is reference here to the presence of numerous heavy metal elements. As with other locations throughout the report, Lisa was not sure if this data needed to be included - she promised to check. Her latest guidance was to limit reference to constituents only if they exceed 3 times background or if they are not naturally occurring. Comment will be investigated.

27	SURFACE WATER PATHWAY, Surface Water Sampling, 1 st full paragraph on page, 1 st sentence.	Since 1985, TI has been collecting grab samples once per month from the outlet of Cooper's Pond. This is reported on DMRs as Outfall 007. Therefore this sentence is invalid. <i>Comment will be incorporated into Final SIP Report.</i>
27	SURFACE WATER PATHWAY, Surface Water Sampling, 1 st full paragraph on page, 3 rd sentence.	There is reference here to the presence of numerous heavy metal elements. As with other locations throughout the report, Lisa was not sure if this data needed to be included - she promised to check. Her latest guidance was to limit reference to constituents only if they exceed 3 times background or if they are not naturally occurring. <i>Comment will be investigated.</i>
27	SURFACE WATER PATHWAY, Surface Water Sampling	M&E conducted additional surface water sampling for VOCs in November 1996. TI provided Lisa with a copy of the report entitled "Phase II - Field Investigation Interim Report" containing the data. <i>Comment will be incorporated into Final SIP.</i>
27	SOIL EXPOSURE PATHWAY, 4 th and last paragraph of section.	This statement is not entirely accurate. There have been numerous other occasions when soils have been sampled either related to MCP emergency response actions, or to characterize waste materials from construction projects prior to disposal. Certainly, extensive sampling (over 5000 discrete samples) were collected and analyzed for radionuclides, and on occasion for some other constituents as well, during the 1992 to 1994 Characterization Phase of the Nuclear Decommissioning Project. <i>Comment will be incorporated into Final SIP Report.</i>
28	AIR PATHWAY, 2 nd paragraph after Table 6	Suggested re-write: "On numerous occasions, TI has performed air discharge sampling to verify air permit requirements. During the Nuclear Decommissioning project, TI conducted perimeter air sampling in accordance with the health & safety plan. Aside from that, no environmental air sampling has been routinely conducted at the TI Attleboro site." <i>Comment will be incorporated into Final SIP Report.</i>
29	SUMMARY, 1 st paragraph at top of page, 2 nd sentence	There is reference here to the presence of numerous heavy metal elements. As with other locations throughout the report, Lisa was not sure if this data needed to be included - she promised to check. Her latest guidance was to limit reference to constituents only if they exceed 3 times background or if they are not naturally occurring. <i>Comment will be investigated.</i>
29	SUMMARY, 1 st paragraph at top of page, 5 th sentence	Since 1985, TI has been collecting grab samples once per month from the outlet of Cooper's Pond. This is reported on DMRs as Outfall 007. Therefore this sentence is invalid. <i>Comment will be incorporated into Final SIP Report.</i>
29	SUMMARY, 1 st paragraph at top of page, 7 th and last sentence	There is reference here to heavy metals, chlorine, cyanide, fluoride, and boron. As with other locations throughout the report, Lisa was not sure if this data needed to be included - she promised to check. Her latest guidance was to limit reference to constituents only if they exceed 3 times background or if they are not naturally occurring. <i>Comment will be investigated.</i>

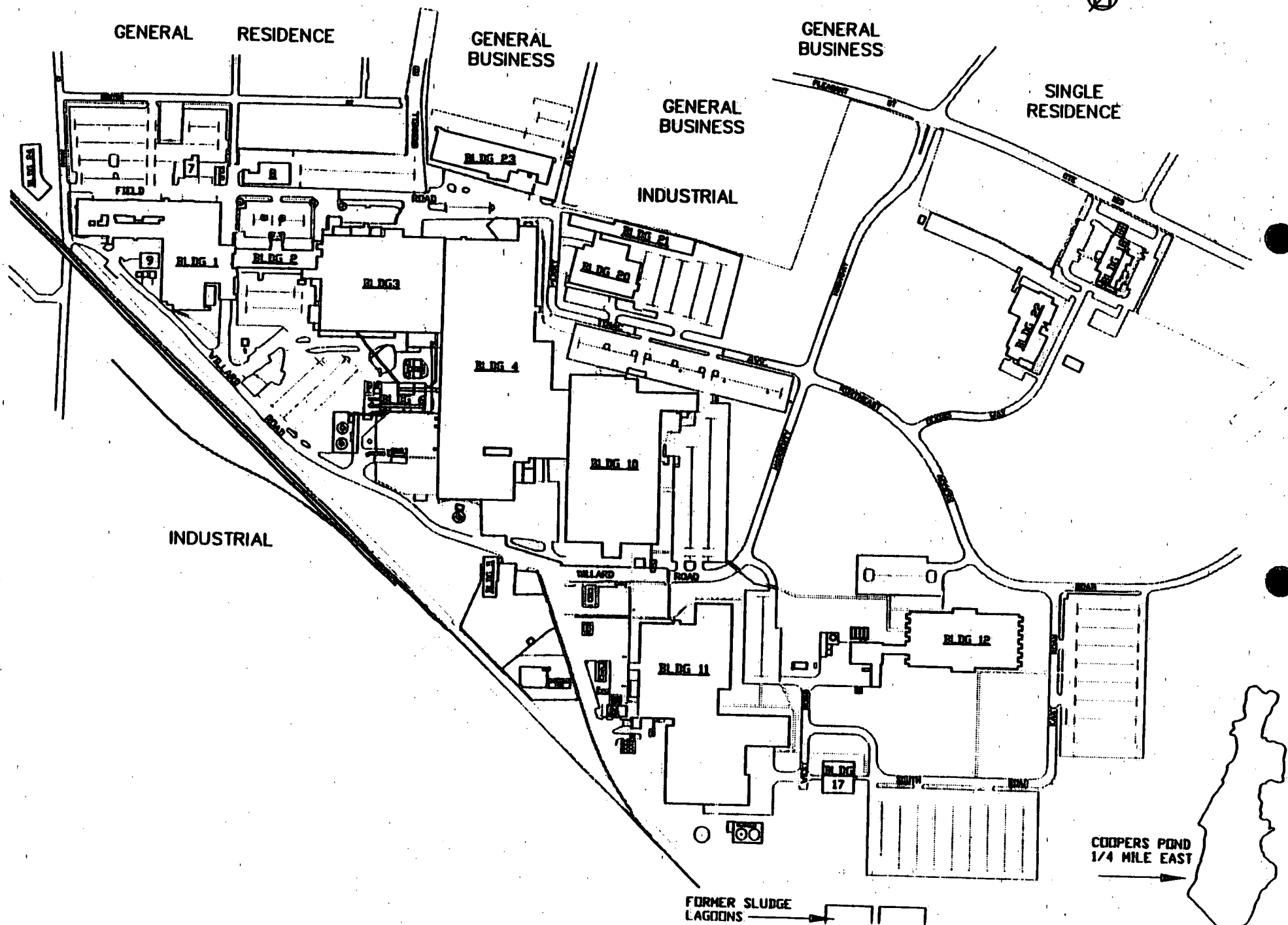
Comments on the Draft SIP Report
 TI Attleboro
 June 17, 1998

29	SUMMARY, 2 nd paragraph on page	As previously stated, this statement is not entirely accurate. <i>Comment will be incorporated into Final SIP Report.</i>
37-39	Appendix B - Hazardous Waste Quantity for the Texas Instruments Site, Entire Table	No less than 40 edits were suggested at the June 9 meeting with Lisa. Most comments related to inaccurate or invalid data contained in the 3 right-most columns. Lisa recorded all suggestions and indicated she would make the necessary changes. It doesn't seem necessary to list all these edits in this correspondence, but if necessary, it can be done. <i>Comments will be incorporated into Final SIP Report.</i>
41	Appendix C Groundwater Monitoring Wells Analytical Results, bottom of page	The designation "Overburden - Offsite" should be inserted preceding well AUG-3. <i>Comment will be incorporated into Final SIP Report.</i>

SIP Report

TEXAS INSTRUMENTS INCORPORATED

FIGURE 2 SITE VICINITY MAP



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FIGURE 3 SITE MAP

